

Exhibit A

IN THE CIRCUIT COURT FOR PUTNAM COUNTY, TENNESSEE

REBECCA R. BAKER,

Plaintiff,

vs.

HOMEGOODS, INC., THE TJX
COMPANIES, INC., RP JACKSON
PLAZA, LLC, RISE PARTNERS, LLC,
DBS CORPORATION, and ARTECH
DESIGN GROUP, INC.
Defendant.

No. 2020CV146
JURY DEMAND

Filed 8-13-20
Time 3:34 P M
Jennifer Wilkerson, Clerk
By MLO D.C.

COMPLAINT

Comes now the Plaintiff, Rebecca R. Baker ("Ms. Baker") and for her cause of action would show unto this Honorable Court as follows:

1. Rebecca R. Baker is a citizen and resident of Greenville, Kentucky.
2. The incident which is the subject of this lawsuit occurred at the HomeGoods store located in Jackson Plaza 377 West Jackson St., Cookeville, TN 38501.
3. Defendant HomeGoods, Inc. is a duly authorized foreign corporation operating and doing business in the state of Tennessee including at Jackson Plaza, 377 West Jackson Street, Cookeville, TN 38501. HomeGoods, Inc. may be served with process through its Registered Agent CT Corporation System, 300 Montvue Rd., Knoxville, TN 37919-5546.
4. Defendant The TJX Companies, Inc. is a duly authorized foreign corporation operating and doing business in the state of Tennessee. On information and belief, Defendant The TJX Companies, Inc. owns and operates HomeGoods, Inc., including their store at Jackson Plaza,

377 West Jackson Street, Cookeville, TN 38501. The TJX Companies, Inc. and may be served with process through its Registered Agent CT Corporation System, 300 Montvue Rd., Knoxville, TN 37919-5546.

5. RP Jackson Plaza, LLC is a Tennessee limited liability company and is the owner of the building and real property at Jackson Plaza 377 West Jackson St., Cookeville, TN 38501, including the location of the HomeGoods store where the incident at issue occurred. RP Jackson Plaza, LLC may be served with process through its Registered Agent Geoffrey W. Smith, Volunteer Building, Suite 507, 832 Georgia Ave, Chattanooga, TN 37402-2227.

6. Rise Partners, LLC is a Tennessee limited liability company and, on information and belief, is the developer, leasing agent, and property manager for the buildings and real property at Jackson Plaza 377 West Jackson St., Cookeville, TN 38501, and in particular the location of the HomeGoods store where the incident at issue occurred. Rise Partners, LLC may be served with process through its Registered Agent Patrick Mitchell, Suite 1200, 832 Georgia Ave, Chattanooga, TN 37402-2285.

7. DBS Corporation is a Tennessee corporation and was the general contractor for the building located at Jackson Plaza 377 West Jackson St., Cookeville, TN 38501 including the HomeGoods store where the incident at issue occurred. DBS Corporation may be served with process through its Registered Agent George T. Bright, Suite 400, 537 Market Street, Chattanooga, TN 37402-1287.

8. Artech Design Group, Inc. is a Tennessee corporation and was, on information and belief, the architect for a remodel of the bathroom of the HomeGoods store where the incident at issue occurred. Artech Design Group, Inc. may be served with process through its Registered Agent J. David Hudson 1410 Cowart St. Chattanooga, TN 37408-1113

9. At all relevant times hereto, the Defendant HomeGoods, Inc. own(ed) and/or operate(d) the HomeGoods business located at Jackson Plaza 377 West Jackson St., Cookeville, TN 38501 and had a responsibility to maintain that premises in a safe manner for the safety and well-being of patrons entering the premises.

10. At all relevant times hereto, on information and belief, The TJ X Companies, Inc. own(ed) and/or operate(d) HomeGoods, Inc. and the HomeGoods business located at Jackson Plaza 377 West Jackson St., Cookeville, TN 38501 and had a responsibility to maintain that premises in a safe manner for the safety and well-being of patrons entering the premises.

11. At all relevant times hereto, RP Jackson Plaza, LLC owned the building in which HomeGoods, Inc. operated at Jackson Plaza 377 West Jackson St., Cookeville, TN 38501 and had a responsibility to maintain that premises in a safe manner for the safety and well-being of patrons entering the premises.

12. At all relevant times hereto, Rise Partners, LLC, on information and belief, was the developer, leasing agent, and property manager for the buildings and real property at Jackson Plaza 377 West Jackson St., Cookeville, TN 38501, and in particular the location of HomeGoods, Inc. where the incident at issue occurred and had a responsibility to maintain that premises in a safe manner for the safety and well-being of patrons entering the premises.

13. At all relevant times hereto, DBS Corporation was the general contractor for the building located at Jackson Plaza 377 West Jackson St., Cookeville, TN 38501 including the HomeGoods store where the incident at issue occurred and had a responsibility to construct the premises in a safe manner for the safety and well-being of patrons entering the premises.

14. At all relevant times hereto, on information and belief, Artech Design Group, Inc. was the architect for the remodel of the building located at Jackson Plaza 377 West Jackson St.,

Cookeville, TN 38501 including the HomeGoods store where the incident at issue occurred and had a responsibility to design the premises in a safe manner for the safety and well-being of patrons entering the premises.

15. On information and belief, at all relevant times hereto, the employees of each of the named Defendants herein acted within the course and scope of their employment.

16. At all times relevant hereto, Ms. Baker was a licensee, invitee and/or business guest/patron of Defendants.

17. On or about August 17, 2019, Ms. Baker was injured when she tripped over a bathroom doorstep and fell in the ladies' restroom of the HomeGoods store at Jackson Plaza 377 West Jackson St., Cookeville, TN 38501.

18. Ms. Baker fell to floor with great force and impact, causing her to suffer serious and debilitating physical injuries.

19. At the time of Ms. Baker's fall and immediately prior thereto the bathroom floor was in a dangerous condition due to the height, size, and location of the doorstep.

20. The Defendants, by and through their employees, created, maintained, controlled, knew, and/or reasonably should have known of the dangerous condition of the bathroom floor prior to and at the time of Ms. Baker's fall.

21. The Defendants knew and/or reasonably should have known of the condition of the bathroom floor for a sufficient amount of time prior to Ms. Baker's fall for the Defendants, in the exercise of due care, to make sure that licensees, invitees, and business guests/patrons, including Ms. Baker, were warned of the condition. No warning of the condition of the floor was provided for patrons entering bathroom before they reached the hazard.


22. The Defendants owed a duty of care to Ms. Baker as a licensee, invitee and/or business guest/patron upon the premises. This duty included: (1) the duty to maintain the premises in a reasonably safe condition; (2) the duty to inspect the premises to discover dangerous conditions; (3) the duty not to create a dangerous condition; and (5) the duty either to remove or adequately warn of the dangerous condition. The Defendants breached these duties.

23. As a direct and proximate result of the breach of these duties Ms. Baker suffered painful and permanent injuries, has incurred and will continue to incur medical expenses, has suffered a loss of enjoyment of life past, present and future, has incurred incidental expenses, inconvenience, mental anguish, has lost wages and suffered a loss of earning capacity. Ms. Baker seeks damages for the above losses from Defendant and all other damages allowed under Tennessee law.

WHEREFORE, PLAINTIFF DEMANDS:

1. That proper process issue requiring the Defendants to answer this Complaint in the time prescribed by law;
2. Recovery for losses, in the form of compensatory damages, awarded to Ms. Baker, in an amount to be determined by a jury, but not to exceed \$750,000.00;
3. That a jury of six (6) be empanelled to try this matter.
4. For any and all general relief to which Ms. Baker is entitled to under the laws of the State of Tennessee.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Rebecca C. Blair', written over a horizontal line.

Rebecca C. Blair, BPR# 017939
1608 Westgate Circle, Suite 100
Brentwood, Tennessee 37027
(615) 953-1122
rblair@blair-law.com
Attorney for Plaintiff

IN THE CIRCUIT COURT OF PUTNAM COUNTY, TENNESSEE

REBECCA R. BAKER,

Plaintiff,

v.

HOMEGOODS, INC., THE TJX
COMPANIES, INC., RP JACKSON
PLAZA, LLC, RISE PARTNERS, LLC,
DBS CORPORATION, and ARTECH
DESIGN GROUP, INC.,

Defendants.

DOCKET NO: 2020-CV-146

Filed 8-31-20
Time 1:51 P M
Jennifer Wilkerson, Clerk
By [Signature] D.C

NOTICE OF APPEARANCE

COMES now Alaric A. Henry and the law firm of Luther-Anderson, PLLP and enters an appearance on behalf of the Defendants, HomeGoods, Inc. and The TJX Companies, Inc., in the above-styled case providing they are properly served and before the Court.

Respectfully submitted,

LUTHER - ANDERSON, PLLP

BY: [Signature]

ALARIC A. HENRY, BPR# 14885
Attorneys for HomeGoods and TJX
One Union Square, Suite 700
100 W. Martin Luther King Blvd.
Chattanooga, Tennessee 37402
(423) 756-5034
(423) 265-9903 (fax)
aah@lutheranderson.com

CERTIFICATE OF SERVICE

This is to certify that I have this day served the following named person with a true and exact copy of this Notice of Appearance by placing same in the United States Mail, addressed to said counsel at his/her office with sufficient postage thereupon to carry the same to its destination at the following address:

Rebecca C. Blair
The Blair Law Firm
1608 Westgate Circle, Suite 100
Brentwood, TN 37027

This 25 day of August, 2020.

LUTHER - ANDERSON, PLLP

BY: 

IN THE CIRCUIT COURT FOR PUTNAM COUNTY, TENNESSEE
AT COOKVILLE

REBECCA R. BAKER,

Plaintiff,

vs.

HOMEGOODS, INC., THE TJX
COMPANIES, INC., RP JACKSON
PLAZA, LLC, RISE PARTNERS, LLC,
DBS CORPORATION, and ARTECH
DESIGN GROUP, INC.

Defendants.

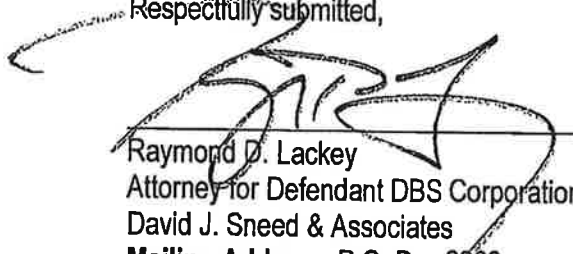
DOCKET NO.: 2020-CV-146
JURY DEMAND

Filed 8-31-20
Time 11:37 P M
Jennifer Wilkerson, Clerk
By [Signature] D.C.

NOTICE OF APPEARANCE

Raymond D. Lackey hereby gives notice of his appearance as attorney of record for Defendant DBS Corporation. This notice is not a general appearance as all issues related to service of process, jurisdictional, procedural and/or substantive rights, defenses or contentions, including statutory limitation of actions, are specifically reserved.

Respectfully submitted,


Raymond D. Lackey #11032
Attorney for Defendant DBS Corporation
David J. Sneed & Associates
Mailing Address: P.O. Box 2903
Hartford, CT 06104-2903
Physical Address: 6640 Carothers Parkway,
Suite 200
Franklin, TN 37067
615-660-6202
rlackey@travelers.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document has been mailed, via U.S. Mail, postage pre-paid, to Ms. Rebecca C. Blair, Attorney for Plaintiff, 1608 Westgate Circle, Suite 100, Brentwood, Tennessee 37027, on this the 28th day of August, 2020.



Raymond D. Lackey

IN THE CIRCUIT COURT FOR PUTNAM COUNTY, TENNESSEE

REBECCA R. BAKER.

Plaintiff,

vs.

HOMEGOODS, INC., THE TJX COMPANIES,
INC., RP JACKSON PLAZA, LLC, RISE
PARTNERS, LLC, DBS CORPORATION and
ARTECH DESIGN GROUP, INC.

Defendants.

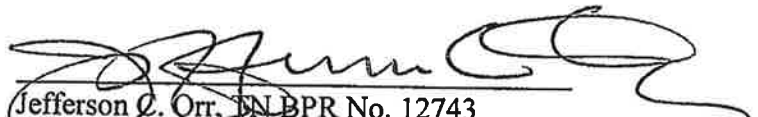
No. 2020CV146
JURY DEMAND

Filed 9-4-20
Time 11:55 AM
Jennifer Wilkerson, Clerk
By [Signature] D.C.

NOTICE OF APPEARANCE

Please note the appearance of attorney Jefferson C. Orr for Defendant Artech Design Group, Inc. in the above-captioned matter.

Respectfully submitted,



Jefferson C. Orr, TN BPR No. 12743

SMITH CASHION & ORR, PLC

3100 West End Avenue

Suite 800 – One American Center

Nashville, TN 37203

(615) 742-8565 – Tel

jorr@smithcashion.com

Attorney for Defendant Artech Design Group, Inc.

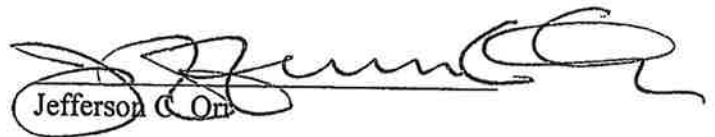
CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this 2nd day of September, 2020, a true and exact copy of the foregoing has been forwarded via electronic mail and/or United States Mail, postage pre-paid, to the following persons:

Rebecca C. Blair
1608 Westgate Circle, Suite 100
Brentwood, TN 37027
(615) 953-1122
rblair@blair-law.com
Attorney for Plaintiff Rebecca R. Baker

Alaric A. Henry
Luther Anderson, PLLP
Suite 700, One Union Square
100 W. Martin Luther King Blvd.
P.O. Box 151
Chattanooga, TN 37401
(423)756-5034
aah@lutheranderson.com
*Attorney for HomeGoods, Inc. and TJX
Companies, Inc.*

Raymond Lackey
David J. Sneed & Associates
536 Market Street
Chattanooga, TN 37402
Attorney for DBS Corporation


Jefferson C. Orr

ORIGINAL

Putnam County	STATE OF TENNESSEE CIVIL SUMMONS page 1 of 1	Case Number 2020 CV 146
Rebecca R. Baker Vs. HomeGoods, Inc. et al.		

Served On:
HomeGoods, Inc. Reg Agent. CT Corporation Systems 377 Montvue Rd. Knoxville, TN 37919-5546

You are hereby summoned to defend a civil action filed against you in Circuit Court, Putnam County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: 8-13-20
Attorney for Plaintiff: Rebecca C. Blair, The Blair Law Firm
1608 Westgate Circle, Suite 100, Brentwood, TN 37027 615-953-1122
Jennifer Wilkerson / Mary Heg
Clerk / Deputy Clerk

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to _____ Clerk, _____ County
Filed 8-13-20
Time 3:34 P M

CERTIFICATION (IF APPLICABLE)

I, _____ Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.
Date: _____
Clerk / Deputy Clerk

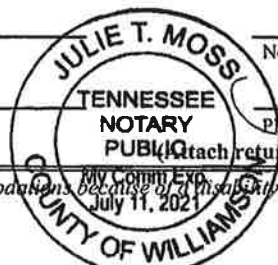
OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows: _____

Date: _____ By: _____
Please Print: Officer, Title
Agency Address _____ Signature _____

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on 8/14/2020, I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant HomeGoods, Inc. On _____ I received the return receipt, which had been signed by Samantha Sutton on 8/17/2020. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: 9/11/2020
Signature of Plaintiff _____
Notary Public / Deputy Clerk (Comm. Expires _____)
Denise Davis, Paralegal with the Blair Law Firm
Plaintiff's Attorney (or Person Authorized to Serve Process)
Attach return receipt on back

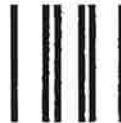


SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete Items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <input checked="" type="checkbox"/> X <u>Samantha Sullivan</u> <input type="checkbox"/> Agent Address</p>	
<p>1. Article Addressed to:</p> <p><u>HomeGoods, Inc.</u> <u>Reg Agent CT Corp. Systems</u> <u>300 Montvue Rd</u> <u>Knoxville, TN 37919-5546</u></p>		<p>B. Received by (Printed Name) _____ C. Date of Delivery <u>AUG 17 2020</u></p>	
<p>2. Article Number (Transfer from service label)</p> <p><u>7016 0600 0001 1401 5413</u></p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below: _____</p>	
<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Registered Mail <input type="checkbox"/> Priority Mail</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail</p> <p><input type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Required</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>		<p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p>	

USPS TRACKING#



9590 9402 4794 8344 7805 87



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•

The Blair Law Firm
1608 Westgate Circle, Ste 100
Brentwood, TN 37027



ORIGINAL

Putnam County	STATE OF TENNESSEE CIVIL SUMMONS page 1 of 1	Case Number 2020cv146
Rebecca R. Baker Vs. The TJX Companies, Inc. et al.		

Served On:

The TJX Companies, Inc. Reg Agent. CT Corporation Systems 377 Montvue Rd. Knoxville, TN 37919-5546

You are hereby summoned to defend a civil action filed against you in Circuit Court, Putnam County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: 8-13-20

Jennifer Wilkerson / Mary Shep
Clerk / Deputy Clerk

Attorney for Plaintiff: Rebecca C. Blair, The Blair Law Firm
1608 Westgate Circle, Suite 100, Brentwood, TN 37027 615-953-1122

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to _____ Clerk, _____ County

Filed 8-13-20
Time 3:34 PM
Jennifer Wilkerson, Clerk
By MHO D.C.

CERTIFICATION (IF APPLICABLE)

I, _____ Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____
Clerk / Deputy Clerk

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows: _____

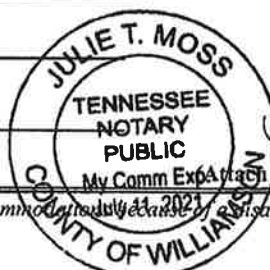
Date: _____ By: _____
Please Print: Officer, Title

Agency Address _____ Signature _____

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on 8/14/2020, I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant The TJX Companies. On _____ I received the return receipt, which had been signed by Samantha Sutton on 8/17/2020. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: 9/11/2020

Signature of Plaintiff



Notary Public / Deputy Clerk (Comm. Expires _____)

Denise Davis
Plaintiff's Attorney (or Person Authorized to Serve Process)

My Comm Expires _____ Attach return receipt on back)

ADA: If you need assistance or accommodation due to disability, please call _____

Filed 9/11/2020 at _____

Time 10:05 AM

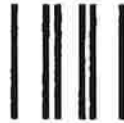
Jennifer Wilkerson, Clerk

By [Signature]

Rev. 03/11

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY		
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p style="font-family: cursive;">The T.J. & Companies Inc. Reg Agent CT Corp. Systems 300 Montvue Rd Knoxville, TN 37919-5546</p> <div style="text-align: center;">  9590 9402 4794 8344 7806 17 </div> <p>2. Article Number (Transfer from service label)</p> <p style="font-family: monospace;">7016 0600 0001 1401 5406</p>	<p>A. Signature Samantha Suter</p> <p>X <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) AUG 19 2021 C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type</p> <table style="width: 100%; border: none;"> <tr> <td style="vertical-align: top;"> <input checked="" type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) </td> <td style="vertical-align: top;"> <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery </td> </tr> </table>	<input checked="" type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	<input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery
<input checked="" type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	<input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery		
<p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p> <p style="text-align: right;">Domestic Return Receipt</p>			

USPS TRACKING#



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

9590 9402 4794 8344 7806 17

United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•

The Blair Law Firm
1608 Westgate Circle, Ste 100
Brentwood, TN 37027



ORIGINAL

Putnam County	STATE OF TENNESSEE CIVIL SUMMONS page 1 of 1	Case Number 2020CV146
Rebecca R. Baker	Vs.	Rise Partners, LLC, et al.

Served On:

Rise Partners, LLC

Reg Agt Patrick Mitchell Suite 1200 832 Georgia Ave. Chattanooga, TN 37402-1287

You are hereby summoned to defend a civil action filed against you in Circuit Court, Putnam County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued:

8-13-20

Jennifer Wilkerson
Clerk / Deputy Clerk

Attorney for Plaintiff:

Rebecca C. Blair, The Blair Law Firm

1608 Westgate Circle, Suite 100, Brentwood, TN 37027 615-953-1122

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Mail list to

Clerk, _____ County

Filed 8-13-20
Time 3:34 PM
Jennifer Wilkerson, Clerk
By MCDC

CERTIFICATION (IF APPLICABLE)

I, _____, Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date:

Clerk / Deputy Clerk

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows: _____

Date:

By:

Please Print: Officer, Title

Agency Address

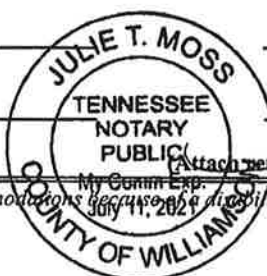
Signature

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on 8/14/2020, I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant Rise Partners, LLC. On _____ I received the return receipt, which had been signed by Jose Vazquez on 8/17/2020. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date:

9/11/2020

Signature of Plaintiff



Notary Public / Deputy Clerk (Comm. Expires _____)

Dawn Denise Davis
Plaintiff's Attorney (or Person Authorized to Serve Process)

Attach return receipt on back

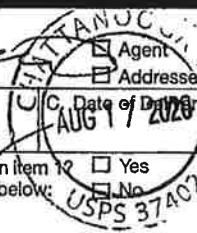
ADA: If you need assistance or accommodations because of a disability, please call _____

Filed 9/14/20

Time 10:05 AM

Jennifer Wilkerson, Clerk

Rev. 03/11

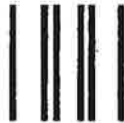
SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																
<p> <input checked="" type="checkbox"/> Complete items 1, 2, and 3. <input checked="" type="checkbox"/> Print your name and address on the reverse so that we can return the card to you. <input checked="" type="checkbox"/> Attach this card to the back of the mailpiece, or on the front if space permits. </p> <p>1. Article Addressed to:</p> <p> Rise Partners, LLC Reg. Asst Patrick Mitchell Suite 1200 832 Georgia Ave. Chattanooga TN 37402-1287 </p> <div style="text-align: center;">  9590 9402 4794 8344 7805 94 </div> <p>2. Article Number (Transfer from service label)</p> <p>016 0600 0001 1401 5369</p>	<p>A. Signature</p> <p><i>[Signature]</i></p> <p>B. Received by (Printed Name) <i>REGIS (R29UP)</i></p> <p>C. Date of Delivery <i>AUG 11 2020</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <div style="text-align: right;">  </div> <p>3. Service Type</p> <table style="width: 100%;"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input checked="" type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Return Receipt for Merchandise</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</td> <td></td> </tr> </table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input checked="" type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®																
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<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery																
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise																
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™																
<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery																
<input type="checkbox"/> Insured Mail																	
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)																	

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

USPS TRACKING#



9590 9402 4794 8344 7805 94



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box®

The Blair Law Firm
1608 Westgate Circle, Ste 100
Brentwood, TN 37027



1.51

Putnam County	STATE OF TENNESSEE CIVIL SUMMONS page 1 of 1	ORIGINAL Case Number <u>8020CV146</u>
Rebecca R. Baker Vs. DBS Corporation et al.		

Served On: DBS Corporation Reg Agt George T. Bright, Suite 400, 537 Market St. Chattanooga, TN 37402 -1287

You are hereby summoned to defend a civil action filed against you in Circuit Court, Putnam County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: 8-13-20


 Clerk / Deputy Clerk

Attorney for Plaintiff: Rebecca C. Blair, The Blair Law Firm
1608 Westgate Circle, Suite 100, Brentwood, TN 37027 615-953-1122

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to _____, Clerk, _____ County
 Filed 8-13-20
 Time 5:34 P M

CERTIFICATION (IF APPLICABLE)

I, _____, Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____

Clerk / Deputy Clerk

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows: _____

Date: _____ By: _____
 Please Print: Officer, Title

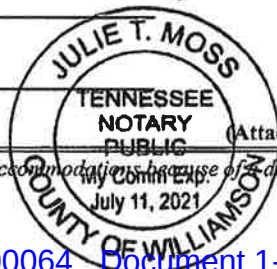
Agency Address

Signature

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on 8/14/20, I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant DBS Corp. On _____, I received the return receipt, which had been signed by _____ on _____. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: 9/11/20 Attorney Raymond Lackey has confirmed service of process as of 9/11/20

Signature of Plaintiff



Notary Public / Deputy Clerk (Comm. Expires _____)

Plaintiff's Attorney (or Person Authorized to Serve Process)

(Attach return receipt on back)

ADA: If you need assistance or accommodations because of a disability, please call _____

Filed 9/14/20 at _____

Time 10:45 A M

Rev. 03/11

By Jennifer Wilkerson Clerk

By MP D.C.

ORIGINAL

Putnam County	STATE OF TENNESSEE CIVIL SUMMONS page 1 of 1	Case Number <u>2020cv146</u>
Rebecca R. Baker Vs. RP Jackson Plaza, LLC, et al.		

Served On:

RP Jackson Plaza, LLC Reg Agent. Geoffrey W. Smith Volunteer Bldg. Suite 507 832 Georgia Ave. Chattanooga, TN 37402

You are hereby summoned to defend a civil action filed against you in Circuit Court, Putnam County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: 8-13-20

Jennifer Wilkerson
Clerk / Deputy Clerk

Attorney for Plaintiff: Rebecca C. Blair, The Blair Law Firm
1608 Westgate Circle, Suite 100, Brentwood, TN 37027 615-953-1122

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to _____ Clerk, _____ County

Filed 8-13-20 M
Time 3:24
Jennifer Wilkerson, Clerk
By MD D.C.

CERTIFICATION (IF APPLICABLE)

I, _____ Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____
Clerk / Deputy Clerk

Filed 9-10-20 A M
Time 2:40
By Jennifer Wilkerson, Clerk D.C.

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by _____, Clerk

I certify that I have served this summons together with the complaint as follows: _____

Date: _____ By: _____
Please Print: Officer, Title

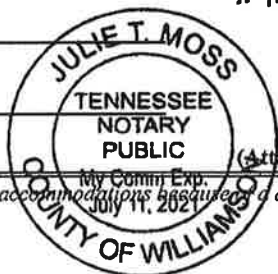
Agency Address

Signature

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on 8/14/2020, I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant RP Jackson Plaza, LLC. On 8/14/2020, I received the green card back which had been signed by _____ with no signature. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: 9/14/2020

Signature of Plaintiff



Notary Public / Deputy Clerk (Comm. Expires _____)

Denise Davis, Paralegal for the Blair Law Firm
Plaintiff's Attorney (or Person Authorized to Serve Process)

(Attach return receipt on back)

ADA: If you need assistance or accommodations because of a disability, please call _____, ADA Coordinator, at () _____

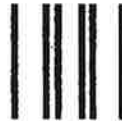
Rev. 03/11

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p>RP Jackson Plaza, LLC Registered Agent Geoffrey W. Smith Volunteer Building Ste 507 832 Georgia Ave, Chattanooga, TN</p>		<p>A. Signature</p> <p>X</p> <p><input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7016 0600 0001 1401 5376</p>		<p>B. Received by (Printed Name)</p> <p>C. Date of Delivery</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail®</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery</p> <p><input type="checkbox"/> Mail Restricted Delivery (D)</p>		<p><input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Signature Confirmation Restricted Delivery</p>	
<p>9590 9402 4794 8344 7806 00</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	

USPS TRACKING#



9590 9402 4794 8344 7806 00



First-Class Mail
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USPS
Permit No. G-10

**United States
Postal Service**

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The Blair Law Firm
1608 Westgate Circle, Ste 100
Brentwood, TN 37027



Putnam County	STATE OF TENNESSEE CIVIL SUMMONS page 1 of 1	Case Number 2020CV146
Rebecca R. Baker	Vs. Artech Design Group, Inc. et al.	

Served On:

Artech Design Group, Inc. Reg Agt David Hudson 1410 Cowart St. Chattanooga, TN 37408-1113

You are hereby summoned to defend a civil action filed against you in Circuit Court, Putnam County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: 8-13-20

Jennifer Wilkerson
Clerk / Deputy Clerk

Attorney for Plaintiff: Rebecca C. Blair, The Blair Law Firm
1608 Westgate Circle, Suite 100, Brentwood, TN 37027 615-953-1122

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to _____ Clerk, _____ County
Filed 8-13-20
Time 3:34 P M
Jennifer Wilkerson, Clerk
By _____

CERTIFICATION (IF APPLICABLE)

I, _____ Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____

Clerk / Deputy Clerk

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows: _____

Date: _____

By: _____
Please Print: Officer, Title

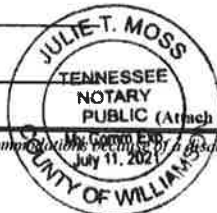
Agency Address _____

Signature _____

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on 8/14/2020, I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant Artech Design Group. On 9/21/2020 I received the return receipt, which had been signed by David Hudson on an unknown date. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: 9/22/2020

Signature of Plaintiff _____



JSM
Notary Public, Deputy Clerk (Comm. Expires _____)
Denise Davis Denise Davis, Paralegal for The Blair Law Firm
Plaintiff's Attorney (or Person Authorized to Serve Process)

ADA: If you need assistance or accommodations because of a disability, please call _____

Filed 9-22-20
Time 1:00 P M
Jennifer Wilkerson, Clerk
By _____ D.C.

Rev. 03/11

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p>Artech Design Group Inc. Reg Agent David Hudson 1410 Cowart St. Charlotte, NC 28208-1113</p> <p>9590 9402 4794 8344 7805 25</p> <p>70</p> <p>PS Form 3849, January 2010</p>		<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Print Name) <u>David Hudson</u></p> <p>C. Date of Delivery <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p> <p>CHARTER TOWN AUG 26 2020</p> <p>USPS 3745</p> <p>3. Service Type <input type="checkbox"/> Adult Signature <input type="checkbox"/> Registered Mail <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Registered Mail Restricted Delivery Merchandise <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Certified Mail Restricted Delivery Merchandise <input type="checkbox"/> Certified Mail Restricted Delivery Merchandise</p> <p>4. Confirmation <input type="checkbox"/> Confirmation <input type="checkbox"/> Confirmation <input type="checkbox"/> Confirmation</p> <p>Domestic Return Receipt</p>	

IN THE CIRCUIT COURT OF PUTNAM COUNTY, TENNESSEE

REBECCA R. BAKER,

Plaintiff,

v.

HOMEGOODS, INC., THE TJX
COMPANIES, INC., RP JACKSON
PLAZA, LLC, RISE PARTNERS, LLC,
DBS CORPORATION, and ARTECH
DESIGN GROUP, INC.,

Defendants.

DOCKET NO: 2020-CV-146

Filed 9-17-20
Time 12:00 P M
Jennifer Wilkerson, Clerk
By [Signature] D.C.

HOMEGOODS, INC. AND THE TJX COMPANIES, INC. ANSWER TO COMPLAINT

COMES now the Defendants, HomeGoods, Inc. and The TJX Companies, Inc., and for Answer to the Summons and Complaint avers as follows:

1. The Complaint fails to state a cause of action upon which relief can be granted.
2. These Defendants are without information sufficient to admit or deny the allegations of Paragraph 1 of the Complaint.
3. The allegations in Paragraph 2 of the Complaint are admitted.
4. The allegations in Paragraph 3 of the Complaint are admitted.
5. The allegations in Paragraph 4 of the Complaint are denied.
6. These Defendants are without information sufficient to admit or deny the allegations in Paragraphs 5 through 8 of the Complaint.
7. It is admitted that HomeGoods, Inc. operated a store as described in Paragraph 9 of the Complaint, but it is denied they owed the store.
8. The allegations in Paragraph 10 of the Complaint are denied.

9. These Defendants are without sufficient information to admit or deny the allegations in Paragraphs 11 through 14 of the Complaint as stated.
10. The allegations in Paragraph 15 of the Complaint provide insufficient information as to what act by what employee it is directed. However, to the extent that the allegations suggests or imply any negligent act by these defendants in the course and scope of employee, such allegations are specifically denied.
11. It is acknowledged upon information belief that Ms. Baker was a customer at the time of the accident as stated in Paragraph 16 of the Complaint.
12. Upon information belief is admitted that Ms. Baker was injured on or around August 17, 2019 as described in Paragraph 17 in the Complaint.
13. These Defendants are without information as to the extent of Plaintiff's injuries as described in Paragraph 18 the Complaint and strict proof thereof is demanded.
14. The allegations in Paragraph 19 of the Complaint are denied.
15. The allegations in Paragraphs 20 through 23 of the Complaint as described are denied.
16. It is denied that HomeGoods Inc. and TJX Companies, Inc. are responsible for the construction, creation, or design of the door stop that is alleged to have caused the alleged fall.
17. It is averred that HomeGoods and TJX had no prior knowledge of any alleged dangerous condition existing on the premises. Further it is denied that TJX Companies Inc. owns or operates the store that is subject of the allegations of the complaint.
18. It is averred in the alternative that the Plaintiff was negligent in looking out for her own safety as it relates to the doorstep, as a result Plaintiff is barred under the doctrine of comparative negligence/comparative fault.

19. It is averred that no alleged action or inaction on behalf of these Defendants was the proximate or legal cause of any alleged injury, damage, or loss as claimed by the Plaintiff.
20. These Defendants reserve the right to amend and to assert further defenses as the evidence should support.
21. Any and all allegations of the Complaint not heretofore admitted, denied, controverted, placed at issue, or otherwise explained are hereby denied as though specifically denied herein.

Now having answered as fully and completely as required by law, this defendant prays to be hence dismissed with the costs to be taxed against the plaintiff and further, the defendants request a jury of twelve (12) to try the issues when joined.

Respectfully submitted,

LUTHER - ANDERSON, PLLP

BY: 

ALARIC A. HENRY, BPR# 14885
KELSEY E. KEEF, BPR# 037569
Attorneys for HomeGoods and TJX
One Union Square, Suite 700
100 W. Martin Luther King Blvd.
Chattanooga, Tennessee 37402
(423) 756-5034
(423) 265-9903 (fax)
aah@lutheranderson.com
kek@lutheranderson.com

CERTIFICATE OF SERVICE

This is to certify that I have this day served the following named person with a true and exact copy of this Answer by placing same in the United States Mail, addressed to said counsel at his/her office with sufficient postage thereupon to carry the same to its destination at the following address:

Rebecca C. Blair
The Blair Law Firm
1608 Westgate Circle, Suite 100
Brentwood, TN 37027

Jefferson C. Orr
Smith Cashion & Orr, PLC
3100 West End Avenue
Suite 800 - One American Center
Nashville, TN 37203

Raymond D. Lackey
David J. Sneed & Associates
6640 Carothers Parkway, Suite 200
Franklin, TN 37067

This 14 day of September, 2020.

LUTHER - ANDERSON, PLLP

BY: 

IN THE CIRCUIT COURT FOR PUTNAM COUNTY, TENNESSEE
AT COOKVILLE

REBECCA R. BAKER,

Plaintiff,

vs.

HOMEGOODS, INC., THE TJX
COMPANIES, INC., RP JACKSON
PLAZA, LLC, RISE PARTNERS, LLC,
DBS CORPORATION, and ARTECH
DESIGN GROUP, INC.

Defendants.

DOCKET NO.: 2020-CV-146
JURY DEMAND

Filed 9-21-20
Time 9:38 AM
Jannifer Wilkerson, Clerk
By [Signature] D.C.

ANSWER

Comes the Defendant, DBS Corporation, and for answer to the Complaint filed against it would respectfully show the Court as follows:

1. Defendant is without sufficient knowledge or information to answer the allegations contained in Paragraphs 1 through 4 of the Complaint and therefore neither admits nor denies same but demands strict proof thereof.
2. Defendant admits the allegations contained in Paragraph 5 of the Complaint.
3. Defendant is without sufficient knowledge or information to answer the allegations contained in Paragraph 6 of the Complaint and therefore neither admits nor denies same but demands strict proof thereof.
4. Defendant admits the allegations contained in Paragraph 7 and 8 of the Complaint.
5. Defendant is without sufficient knowledge or information to answer the allegations contained in Paragraphs 9 and 10 of the Complaint and therefore neither admits nor denies same but demands strict proof thereof.

6. In regard to the allegations contained in Paragraph 11 of the Complaint, Defendant admits that RP Jackson Plaza, LLC owned the building in question. Defendant is without sufficient knowledge or information to answer all further allegations contained in Paragraph 11 of the Complaint and therefore neither admits nor denies same but demands strict proof thereof.

7. Defendant is without sufficient knowledge or information to answer the allegations contained in Paragraph 12 of the Complaint and therefore neither admits nor denies same but demands strict proof thereof.

8. In regard to the allegations contained in Paragraph 13 of the Complaint, Defendant admits that it was the general contractor for the project in question. Defendant states that it has a general duty to perform its work in a reasonably safe manner in light of the attending circumstances.

9. In regard to the allegations contained in Paragraph 14 of the Complaint, Defendant admits that Artech Design Group, Inc. was the architect for the project in question. Defendant is without sufficient knowledge or information to answer all further allegations contained in Paragraph 14 of the Complaint and therefore neither admits nor denies same but demands strict proof thereof.

10. Defendant is without sufficient knowledge or information to answer the allegations contained in Paragraph 15 of the Complaint and therefore neither admits nor denies same but demands strict proof thereof.

11. Defendant denies the allegations contained in Paragraph 16 of the Complaint of the Complaint as they apply to this defendant.

12. Defendant is without sufficient knowledge or information to answer the allegations contained in Paragraphs 17 and 18 of the Complaint and therefore neither admits nor denies same but demands strict proof thereof.

13. Defendant denies the allegations contained in Paragraph 19 of the Complaint

14. Defendant denies the allegations contained in Paragraphs 20 through 23 of the Complaint of the Complaint as they apply to this defendant.

15. All allegations of the Complaint not specifically admitted, denied or explained are here and now generally denied as though specifically denied.

AFFIRMATIVE DEFENSES

16. All injuries and damages allegedly sustained by Plaintiff were solely caused by her own negligence in failing to keep a proper lookout, failing to note or avoid a condition that was there to be seen, failing to watch where she was walking or stepping and failing to maintain adequate control of her safety thus barring her claims for relief.

17. Place Services, Inc. performed construction work in the area where Plaintiff fell including the placement of the doorstep in question. Place Services, Incorporated may be at fault for Plaintiff's accident and alleged injuries. The registered agent for Place Services, Incorporated is Corporation Service Company, 2908 Poston Avenue, Nashville, Tennessee 37203-1312.

18. Defendant asserts the Doctrine of Comparative Fault and thus the liability for the alleged injuries and damages should be apportioned among the parties or entities at fault in proportion to their respective negligence. If the negligence of Plaintiff is deemed to constitute fifty percent (50%) or more of the combined negligence causing the alleged injuries and damages, the claims for relief of Plaintiff are barred.

Wherefore, Defendant DBS Corporation, having fully answered the Complaint filed against it, requests that it be dismissed with costs taxed to the Plaintiff. Defendant further demands a jury of twelve (12) persons to try this cause.

Respectfully submitted,



Raymond D. Lackey

#11032

Attorney for Defendant DBS Corporation

David J. Sneed & Associates

Mailing Address: P.O. Box 2903

Hartford, CT 06104-2903

Physical Address: 6640 Carothers Parkway, Suite 200

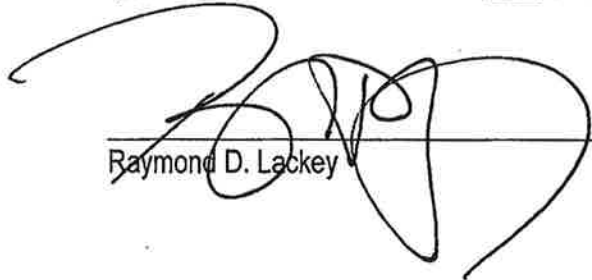
Franklin, TN 37067

615-660-6202

rlackey@travelers.com

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document has been mailed, by U.S. Mail, postage pre-paid, to Ms. Rebecca C. Blair, Attorney for Plaintiff, 1608 Westgate Circle, Suite 100, Brentwood, Tennessee 37027; Mr. Jefferson Orr, Attorney for Defendant Artech Design Group, Inc., Smith, Cashion & Orr, PLC, 3100 West End Avenue, Nashville, TN 37203; Mr. Alaric A. Henry, Attorney for Defendants, HomeGoods, Inc. and TJX Companies, Inc., Luther-Anderson PLLP, 100 W. Martin Luther King Blvd., Suite 700, P.O. Box 151, Chattanooga, TN 37401-0151 on this the 22nd day of September, 2020.



Raymond D. Lackey

IN THE CIRCUIT COURT FOR PUTNAM COUNTY, TENNESSEE
AT COOKEVILLE

REBECCA R. BAKER,

Plaintiff,

vs.

HOMEGOODS, INC., THE TJX
COMPANIES, INC., RP JACKSON
PLAZA, LLC, RISE PARTNERS, LLC,
DBS CORPORATION, and ARTECH
DESIGN GROUP, INC.

Defendants.

No. 71CC1-2020-CV-146
JURY DEMAND

Filed 10-8-20
Time 10:30 AM
Jennifer Wilkerson, Clerk
By [Signature] D.C.

NOTICE OF VOLUNTARY NON-SUIT OF DEFENDANT TJX COMPANIES, INC.

Comes now Plaintiff, Rebecca R. Baker, by and through counsel and pursuant to Rule 41.01 of the Tennessee Rules of Civil Procedure and respectfully gives notice of her voluntary dismissal without prejudice of the claims against Defendant TJX Companies, Inc.

Respectfully submitted,

[Signature]
Rebecca C. Blair, BPR #017939
The Blair Law Firm
1608 Westgate Circle, Suite 100
Brentwood, Tennessee 37027
(615) 953-1122 – office
(615) 953-1121 – facsimile
rblair@blair-law.com
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been sent via U.S. mail, postage prepaid, and properly addressed to:

Alaric A. Henry, Esq.
Luther - Anderson, PLLP
One Union Square, Suite 700
100 West Martin Luther King Blvd
Chattanooga, TN 37402
*Attorney for Defendants HomeGoods, Inc.
& The TJX Companies, Inc.*

Raymond Lackey, Esq.
David J. Sneed & Associates
P.O. Box 2903
Hartford, CT 06104-2903
Attorney for Defendant DBS Corporation

Mary Dee Allen, Esq.
Wimberly Lawson Wright Daves &
Jones, PLLC
1420 Neal Street, Suite 201
Cookeville, TN 38503-0655
*Attorneys for Defendants RP Jackson
Plaza, LLC & Rise Partners, LLC*

Jefferson C. Orr, Esq.
Smith Cashion & Orr, PLC
3100 West End Avenue
Suite 800 - One American Center
Nashville, TN 37203
*Attorney for Defendant Artech Design
Group, Inc.*

this 5 day of October 2020.


Rebecca C. Blair